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Attorney for ROBERT G. TUNNELL, JR.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,
Plaintiff,
v.
ROBERT G. TUNNELL, JR.,
Defendant.

CASE NO. CR 11-0463 CRB

**STIPULATION AND [PROPOSED]
ORDER MODIFYING CONDITIONS OF
RELEASE TO PERMIT TRAVEL TO
NORDEN, CALIFORNIA**

STIPULATION

Defendant Robert G. Tunnell, Jr., by and through his counsel, Edward W. Swanson, and the United States, by and through Assistant United States Attorney Doug Sprague, hereby stipulate and agree as follows:

1. On June 24, 2011, the Court set conditions of release for defendant Robert G. Tunnell, Jr., one of which was a condition that he not travel outside the Northern District of California without the permission of the Court.

Three short diagonal lines, each ending in a small tick mark, arranged in a vertical column.

2. The parties HEREBY STIPULATE that the conditions of Mr. Tunnell's release be modified to permit him travel to Norden, California in Nevada County to visit with his family. Mr. Tunnell will depart from his residence in San Francisco on April 7, 2012 and will stay at the home of his son David Tunnell and daughter-in-law Susan Tunnell located at 717 Mule's Ear Court, Norden, CA, on the evening of April 7, 2012. Weather permitting, Mr. Tunnell will return to San Francisco on April 8, 2012.
3. Pretrial Service Officer Josh Libby has no objection to the proposed modification.

IT IS SO STIPULATED.

DATED: March 28, 2012

/s/

DOUG SPRAGUE
Assistant United States Attorney

/s/

EDWARD W. SWANSON
Swanson & McNamara LLP
Attorneys for ROBERT G. TUNNELL

ORDER

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

DATED: April 2, 2012

CHARLES R. BREYER
United States District Judge